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Attorneys for Defendant and Counterclaimant Skyryse, Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MOOG INC.,

Plaintiff,

V

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and
DOES NOS. 1-50.

Defendants.

SKYRYSE, INC.,

Counterclaimant,

V

MOOG INC.

Counterclaim-Defendant.

CASE NO. 2:22-cv-09094-GW-MAR

**DEFENDANT-COUNTERCLAIMANT
SKYRYSE, INC.'S APPLICATION
FOR LEAVE TO LODGE UNDER
SEAL CERTAIN PORTIONS OF
DEFENDANT-COUNTERCLAIMANT
SKYRYSE'S SUPPLEMENTAL
MEMORANDUM IN SUPPORT OF
MOTION TO ENFORCE ORDER
COMPELLING TSID**

Hon. Margo A. Rocconi

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that, pursuant to Local Rule 79-5.2.2(b), Defendant
 3 and Counterclaimant Skyryse, Inc. (“Skyryse”) hereby applies for an order
 4 permitting the following documents filed in connection with Skyryse’s
 5 Supplemental Memorandum in Support of Motion to Enforce Order Compelling
 6 TSID (“Supplemental Memorandum”) to be lodged under seal with the Court.

7 Document	8 Designating Party	9 Text to be Filed/Lodged 10 under Seal
11 Defendant- 12 Counterclaimant 13 Skyryse, Inc.’s 14 Supplemental Memorandum in Support of Motion to Enforce Order Compelling TSID	15 Moog	16 Highlighted portions in 17 the unredacted version at 18 page: 19 3

20 As the Filing Party, Skyryse has provisionally lodged under seal certain
 21 portions of the Supplemental Memorandum that Plaintiff and Counterclaim-
 22 Defendant Moog, Inc. has designated as Protected Material under the Protective
 23 Order entered in this action, dated May 6, 2022 (Dkt. 89), or that Moog has otherwise
 24 requested to be sealed. Accordingly, pursuant to paragraph 12.1 of the Protective
 25 Order, Skyryse seeks to provisionally lodge these materials under seal until such
 26 time as Moog withdraws its confidentiality designations or the Court rules on a
 27 forthcoming application from Moog to justify that these documents, or portions of
 28 thereof, remain under seal. Skyryse reserves all rights under the Protective Order to
 challenge Moog’s designations of the identified materials as Protected Material.

29 This application is further based upon the accompanying Declaration of
 30 Kelley Storey in Support of this Application; any pleadings, files, and records in this
 31 action; and any further evidence or argument as this Court may consider.

1 On May 23, 2023, counsel for Skyryse conferred via email with counsel for
2 Moog regarding the supplemental memorandum. On May 23, 2023, counsel for
3 Moog confirmed that certain portions of the supplemental memorandum should be
4 provisionally lodged under seal, as they involve references to sensitive government
5 programs.

6

7 Dated: May 24, 2023

Respectfully submitted,

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LATHAM & WATKINS LLP

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By: /s/ Gabriel S. Gross

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